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UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD SYMANTEC CORPORATION Petitioner, v. INTELLECTUAL VENTURES I LLC,

Case No. IPR2016-01433 U.S. Patent No. 7,757,298

Patent Owner

PATENT OWNER'S RESPONSE



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	2. Symantec did not prove that Hoffman discloses comparing an identification value of the selected file with identification values associated with unauthorized files	.16
	3. Symantec did not prove that DeSouza teaches a computer or computer program "selecting a file."	.17
	4. Symantec did not prove that a skilled artisan would have had a reason to combine DeSouza and Hoffman	.21
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	2.	Neither Hyppönen nor Johnson teaches "selecting [a] file based on whether the file comprises data beyond an end of data marker for the file."	.36	
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2001	Definitions of part and portion, Webster's New Collegiate Dictionary 835, 896–97 (G.&C. Merriam Co. 1973)
2002	Intellectual Ventures I LLC v. HCC Insurance Holdings, Inc., No. 6:16-cv-00660, Exhibit A to Amended Joint Claim Construction and Prehearing Statement (E.D. Tex. Apr. 4, 2016)
2003	Intellectual Ventures I LLC v. HCC Insurance Holdings, Inc., No. 6:16-cv-00660, Plaintiff Intellectual Ventures I LLC and Intellectual Ventures II LLC's Opening Claim Construction Brief (E.D. Tex. May 4, 2016)
2004	Intellectual Ventures I LLC v. HCC Insurance Holdings, Inc., No. 6:16-cv-00660, Plaintiff Intellectual Ventures I LLC and Intellectual Ventures II LLC's Reply Claim Construction Brief (E.D. Tex. May 25, 2016)
2005	Intellectual Ventures I LLC v. HCC Insurance Holdings, Inc., No. 6:16-cv-00660, Exhibit A to Joint Claim Construction Chart Pursuant to P.R. 4-5(D) (E.D. Tex. June 1, 2016)
2006	Declaration of David M. Goldschlag, Ph.D.
2007	CV of David M. Goldschlag, Ph.D.
2008	Definition of "Unauthorized," Merriam-Webster.com
2009	Definition of "Select," Merriam-Webster.com
2010	Deposition transcript of Jack Davidson (April 5, 2017)
2011	Intellectual Ventures I LLC, et al. v. Erie Indemnity Company, et al., No. 2017-1147, Brief for Appellants (Fed. Cir.)
2012	Intellectual Ventures I LLC, et al. v. Erie Indemnity Company, et al., No. 2017-1147, Brief for Defendants-Appellees (Fed. Cir.)



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